

**RESPONSE BY EUROPEAN REGIONS AIRLINE ASSOCIATION (ERA)
TO THE EUROPEAN COMMISSION CONSULTATION PAPER
ON THE POSSIBLE REVISION OF REGULATION 2299/89
ON A CODE OF CONDUCT FOR COMPUTERISED RESERVATION SYSTEMS**

ERA welcomes simplification of European Union laws, and recommended the deletion of Regulation 2299/89 in its response to Commission Vice President Verheugen's internet consultation in 2005/6 on Regulations and Directives that add unnecessary costs to businesses.

The ERA Directorate has conducted a further survey of members as a result of this new consultation on Regulation 2299/89 by the European Commission.

Following this survey ERA's position remains unchanged: ERA proposes that the Regulation should be deleted. However, under the guidelines for better regulation, it is clear that any such proposal by the Commission should be accompanied by an impact assessment. ERA would require to be consulted during the development of the impact assessment.

ERA's position on Regulation 2299/89 is based on the changes of ownership and of control of the computerised reservation systems (CRSs), and the opening of new sales channels (in particular internet sales channels), since the formulation of the Regulation.

ERA's position is also based on the assumption that generic EU competition laws would be adequate to control any anti-competitive behaviour by companies providing CRSs. Should this assumption prove to be flawed, ERA would prefer simplification of the Regulation rather than its deletion, retaining only those features that would provide a fast remedy against anti-competitive behaviour. This issue should be addressed in the impact assessment.

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